



U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

April 27, 2020

By E-mail

Katherine Ruth Rosenfeld
Emery Celli Brinckerhoff & Abady LLP
600 Fifth Avenue, 10th Floor
New York, New York 10020

Re: *Chunn et al. v. Warden Derek Edge*, Civil Action No. 20-cv-1590 (Kovner, J.)

Dear Ms. Rosenfeld:

Pursuant to the Court's April 25th Order, Respondent writes to advise Petitioners that he opts "to conduct a deposition of Dr. Venters, in which event Petitioners' counsel will prepare and serve disclosures relating to Dr. Venters under Rule 26(a)(2)(C)." Dkt. No. 65. Please provide these Rule 26(a)(2)(C) disclosures by 3 p.m. on Wednesday, April 29, in advance of Dr. Venters' deposition.

Consistent with the Court's Order permitting Respondent to conduct a deposition of Dr. Venters *in lieu* of Petitioners producing his expert report due on April 30 (Dkt. No. 65), Respondent will proceed with Dr. Venters' deposition on Thursday, April 30 at 10 a.m., as previously Noticed. We will provide additional information regarding the logistics of Dr. Venters' deposition shortly.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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cc: The Honorable Roanne L. Mann (by ECF)